

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
5 John Neukom (Bar No. 275887)
johnneukom@quinnemanuel.com
6 Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
8 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S MOTION
FOR RECONSIDERATION OF ORDER
GRANTING IN PART AND DENYING IN
PART ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. 2393)**

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC’s Motion for
 7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under
 8 Seal (Dkt. 2393) (“Motion for Reconsideration”). The Motion for Reconsideration seeks an order
 9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Waymo’s Opposition to Uber’s Motion to Compel Production of
 11 Documents (previously filed at Dkt. 1048-4) marked in red boxes on page 1 of the sealed version filed
 12 concurrently herewith as Exhibit A (in addition to passages previously granted sealing) disclose highly
 13 sensitive and confidential information about Waymo’s potential business models as well as its current
 14 and potential business and partnership plans. I understand that public disclosure of such specific
 15 business strategy information would enable competitors to unfairly tailor their own business strategy
 16 based on Waymo’s confidential business strategy and plans, which would cause Waymo significant
 17 competitive harm.

18 4. The portions of the July 26, 2017 Deposition Transcript of Jennifer Haroon (previously
 19 filed as Exhibit 3 at Dkt. 1048-9) marked in red boxes in the sealed version filed concurrently
 20 herewith as Exhibit B (specifically, at deposition pages and lines 108:6,25; 124:1,6, in addition to
 21 passages previously granted sealing) disclose highly sensitive and confidential information about its
 22 current and potential business models and plans. I understand that public disclosure of such specific
 23 business strategy information would enable competitors to unfairly tailor their own business strategy
 24 based on Waymo’s confidential business models and plans, which would cause Waymo significant
 25 competitive harm.

26 5. The portions of the July 17, 2017 Deposition Transcript of Larry Page (previously filed
 27 as Exhibit 1 at Dkt. 1114-2/1068-5) marked in red boxes in the sealed version filed concurrently
 28 herewith as Exhibit C (specifically, at deposition pages and lines 97:5,25; 108:19; 183:10; 214:21,25;

1 215:6, in addition to passages previously granted sealing) disclose highly sensitive and confidential
 2 information about its potential business models as well as its current and potential business and
 3 partnership plans. I understand that public disclosure of such detailed business strategy information
 4 would enable competitors to unfairly tailor their own business strategy based on Waymo's
 5 confidential business strategy and plans, which would cause Waymo significant competitive harm.

6 6. The portions of the July 24, 2017 and July 25, 2017 Deposition Transcripts of Bryan
 7 Salesky (previously filed as Exhibit 4 at Dkt. 1114-5/1068-10) marked in red boxes in the sealed
 8 version filed concurrently herewith as Exhibit D (specifically, at deposition pages and lines 145:2;
 9 146:2,5; 148:6,12; 151:1,3,7-8; 247:2) disclose highly sensitive and confidential information about its
 10 financial valuation as well as its current and potential business and partnership plans, including the
 11 confidential identities of third parties involved in those plans. I understand that public disclosure of
 12 such detailed business strategy information would enable competitors to unfairly tailor their own
 13 business strategy based on Waymo's confidential business strategy and plans, which would cause
 14 Waymo significant competitive harm.

15 7. The portions of the document bearing Bates stamp WAYMO-UBER-00026174
 16 (previously filed as Exhibit 5 at Dkt. 1068-11) marked in red boxes in the sealed version filed
 17 concurrently herewith as Exhibit E disclose the confidential email address of a senior Google
 18 executive. I understand that public disclosure of such email addresses would cause Waymo and that
 19 executive substantial harm due to the high public profile of this litigation.

20 8. The portions of the document bearing Bates stamps WAYMO-UBER-00008935 to
 21 WAYMO-UBER-00008939 (previously filed as Exhibit 4 at Dkt. 1105-4/1080-10) marked in red
 22 boxes in the sealed version filed concurrently herewith as Exhibit F (specifically, at pages WAYMO-
 23 UBER-00008937 to WAYMO-UBER-00008938) disclose highly sensitive and confidential
 24 information about its business plans and policies. I understand that public disclosure of such detailed
 25 business strategy information would enable competitors to unfairly tailor their own business strategy
 26 based on Waymo's confidential business plans and policies, which would cause Waymo significant
 27 competitive harm.

28

9. The portions of the August 2, 2017 Deposition Transcript of John Krafcik (previously filed as Exhibit 6 at Dkt. 1105-8/1080-14) marked in green boxes in the sealed version filed concurrently herewith as Exhibit G (specifically, at deposition page and lines 51:10; 253:4, in addition to passages previously granted sealing) disclose Waymo's detailed financial and valuation information. I understand that public disclosure of such detailed financial information could enable competitors to unfairly tailor their investment efforts based on Waymo's confidential financial valuations of the company as a whole based on confidential competitive analyses, which would cause Waymo significant competitive harm.

9 10. The portions of the document bearing Bates stamp WAYMO-UBER-00026185
10 (previously filed as Exhibit 2 at Dkt. 1098-4) marked in red boxes in the sealed version filed
11 concurrently herewith as Exhibit H disclose the confidential email address of a senior Google
12 executive. I understand that public disclosure of such email addresses would cause Waymo and that
13 executive substantial harm due to the high public profile of this litigation.

14 11. Waymo's current requests to seal are more narrowly tailored than its prior sealing
15 requests with respect to Exhibits A-H.

17 I declare under penalty of perjury under the laws of the State of California and the United
18 States of America that the foregoing is true and correct, and that this declaration was executed in San
19 Francisco, California, on December 21, 2017.

By /s/ Felipe Corredor
Felipe Corredor
Attorneys for WAYMO LLC

ATTESTATION

24 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
25 document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven